REMARKS

This is in response to the non-final Office Action mailed 5/13/2010. Reconsideration of this application is respectfully requested in view of this response.

STATUS OF CLAIMS

Claims 1-4, 9 and 14-20 are pending.

Claims 5-8 and 10-13 were previously canceled.

Claims 1, 9, 17 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini et al. (U.S. Pub. Appl. 2003/0088639) in view of Bowman (U.S. Pub. Appl. 2004/0111672).

Claims 2-4, 14 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini et al. (U.S. Pub. Appl. 2003/0088639) in view of Bowman (U.S. Pub. Appl. 2004/0111672), and further in view of O'Neil (U.S. Patent 6,889,226).

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini et al. (U.S. Pub. Appl. 2003/0088639) in view of Bowman (U.S. Pub. Appl. 2004/0111672), and further in view of Hu (U.S. Patent 7,274,671).

Claims 18 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini et al. (U.S. Pub. Appl. 2003/0088639) in view of Bowman (U.S. Pub. Appl. 2004/0111672), and further in view of Farrell et al. (U.S. Pub. Appl. 2005/0192955).

REJECTIONS UNDER 35 U.S.C. § 103(a)

Claims 1, 9, 17 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini et al. (U.S. Pub. Appl. 2003/0088639), hereafter "**Lentini**" in view of Bowman (U.S. Pub. Appl. 2004/0111672), hereafter "**Bowman**". Claims 2-4, 14 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini in view of Bowman, and further in view of O'Neil (U.S. Patent 6,889,226), hereafter "**O'Neil**". Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini in view of Bowman, and further in view of Hu (U.S. Patent 7,274,671), hereafter "**Hu**". Claims 18 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lentini in view of Bowman, and further in view of Farrell et al. (U.S. Pub. Appl. 2005/0192955), hereafter "**Farrell**".

To be properly rejected under 35 U.S.C. § 103(a), the cited references have to provide for each and every element of the rejected claims. Applicants respectfully submit that the combination of the Lentini and Bowman, the combination of Lentini, Bowman, and O'Neil, the combination of Lentini, Bowman, and Hu, and/or the combination of Lentini, Bowman, and Farrel, all fail to teach or suggest many of the features of the rejected claims.

Applicants' claim 1 teaches the following steps: (a) converting a mark-up language document to a logical tree-based representation comprising a plurality of nodes, each node other than a root node having a local identifier, (b) choosing an initial base length of at least one byte with which to encode local identifiers of said nodes, (c) sequentially encoding each local identifier other than said root node in hexadecimal notation starting with an initial hexadecimal value and incrementing the initial hexadecimal value by said initial base length, (d) adaptively

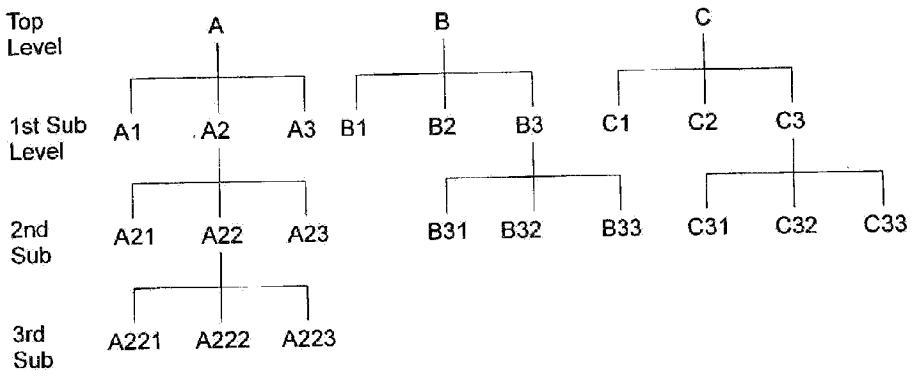
extending said initial base length by at least one additional byte upon exhausting all incremental hexadecimal values based on said initial base length, (e) encoding at least one local identifier other than said root node and a node not encoded in step (c) based on said extended base length, (f) assigning node identifiers to said plurality of nodes other than said root node by concatenating encoded values of local identifiers of all nodes along a path from said root node to a node to which a node identifier is currently being assigned, and (g) outputting and storing said node identifiers associated with said nodes of said mark-up language document in computer storage. Applicants' independent claims 9 and 16 also recite many similar features.

Lentini provides for a system for collaborative exchange of Web based content information between and among disparate and unrelated content sources includes a content server, and a server appliance, electronically disposed between the content server and a network which terminates HTTP sessions directed to the content server and initiates a HTTP session with the content server as a proxy. Specifically, Lentini also teaches a content collaboration engine, hosted on the server appliance that includes a content recognition engine (which receives content from the server, converts received content to DOM, and classifies content in accordance with XML recognition rules), a content mapping engine (that extracts content definition fields from classified content and requests related content from collaborating sites, the requested content having content definition fields including values substantially the same as the extracted content definition fields).

With regards to Applicants' feature of adaptively extending said initial base length by at least one additional byte upon exhausting all incremental hexadecimal values based on said

initial base length, the Examiner on page 3 of the Office Action of 05/13/2010 contends that such a feature is disclosed by FIG. 5 of Lentini. Applicants respectfully disagree with the Examiner's conclusion.

Lentini's FIG.5 is provided below:



The accompanying description of FIG. 5 of Lentini can be found in paragraphs [**0053**] through [**0055**], which are reproduced verbatim below:

[**0053**] As depicted in the simplified semi-schematic diagram of **FIG. 5**, a global, hierarchical classification or categorization model is divided vertically into a number of levels or sub-levels, with an increasing density of nodes occurring at each next progressive level (traveling downward through the diagram). The first level of such a structure is commonly termed the top level and suitably comprises the starting point for progression through the structure. In the exemplary embodiment of **FIG. 5**, the top level set of nodes are denoted by alpha characters A, B and C. It should be noted that the top level nodes A, B and C do not need to have any relationship with one another and, may indeed represent the starting point for completely disjoint and unrelated structures or categories. If one were to enter the exemplary hierarchical structure of **FIG. 5**, one might choose to enter at a top level node A, which might be the top level descriptor referring to a particular or specific body of information pertinent to the organization of that particular structure.

[**0054**] Upon entry at top level A, a user who traverses the structure might either be presented with a body of information specifically related to the A descriptor or, as is more likely, might be offered an additional set of choice vectors, represented by the more finely grained sub-category nodes, denoted in the exemplary diagram of **FIG. 5** by nodes **A2**, **A22** and **A222**. Each of these first "sub-level" nodes should be understood as representing a rational subdivision or subgrouping of the generalized content represented by the top level category header A.

[**0055**] Likewise, each of these first "sub-level nodes" might lead to a further set of rational subdivisions or subgrouping if, indeed, the content represented by each of the first sub-level nodes is still too generalized for compre-

hension. In the exemplary diagram of **FIG. 5**, the first sub-level node **A2** represents an entry point to a set of additional (second) sub-level nodes denoted **A21**, **A22** and **A23** indicating that these nodes depend from the first sub-level node denoted **A2**. These second sub-level nodes might contain a body of content material but might also contain entry points to a set of third sub-level nodes which might be denoted **A221**, **A222** or **A223**, if the entry point of the third sub-level were chosen from the node **A22**.

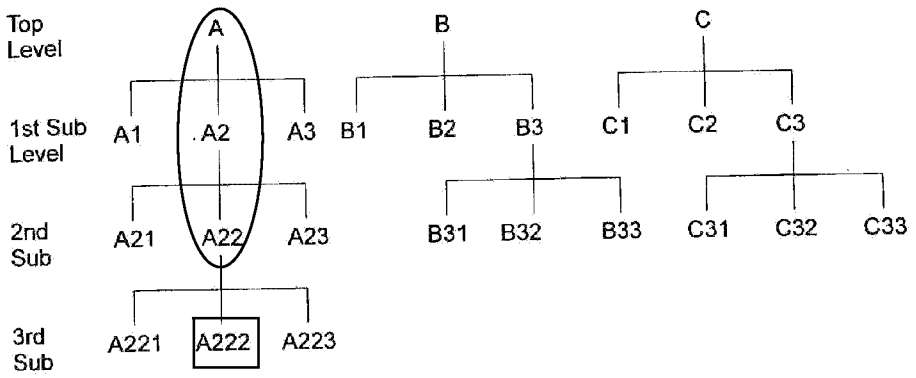
As can be seen above, Lentini, by their own admission, refer to "**A**", "**A2**", "**A22**", and "**A222**" as "**alpha characters**" and NOT hexadecimal values (as the Examiner contends). Applicants' claim 1 specifically requires **extending** said initial base length by at least one additional byte **upon exhausting all incremental hexadecimal values**. Applicants respectfully submit that the level (i.e., "**A**") and sublevels (i.e., "**A2**", "**A22**", and "**A222**") shown in FIG. 5 are merely alphanumeric characters, and are NOT coded hexadecimal values. Further, Applicants also respectfully submit that the same alphanumeric characters CANNOT be equated to Applicants' feature of extensions to initial base length as there are NO hexadecimal values that are exhausted prior to such an extension. Alpha characters shown in FIG. 5 merely show a simplistic approach of extensions to character "A", by adding one or more 2's (i.e., a first instance of A2, a second instance of A22, and so on). Applicants respectfully submit that **no values are exhausted** prior to such extensions.

With regards to Applicants' feature of assigning node identifiers to said plurality of nodes other than said root node by concatenating encoded values of local identifiers of all nodes along a path from said root node to a node to which a node identifier is currently being assigned, the Examiner cites paragraph [**0057**] and FIG. 5 of Lentini as teaching such a feature. Applicants respectfully disagree with the Examiner's conclusion.

Paragraph [**0057**] of Lentini is reproduced verbatim below:

[0057] It should be understood that although the foregoing was described in connection with a particular travel path starting at a top level node A and traversing a nodal structure through the central node, real hierarchical structures are certainly neither so uniform nor so directed. There may be any number of nodes residing in any of the sub-levels, each of which might further branch into any number of additional lower level nodes. Once a particular starting point is chosen, the structure might be traversed in any direction, from node to node, that a user desires. Indeed, and in accordance with the invention, the structure may be entered non- hierarchically, so long as a definitional index for any sub-level node (i.e., A2134) is known to a user. The CCS categorizes the various content sites so as to allocate contained content to a respective, rationally related node, whether that node is top-level, first or second sub-level, or the like. A collaboration consortium determines the rational meaning of top-level nodes such as A, B and C, in order to differentiate the content collection that each top-level node represents.

Paragraph [**0057**] above merely mentions traversing a nodal structure, wherein a user can traverse from any node to another node. Further, as described above, FIG. 5 does not illustrate hexadecimal-based nodes but merely illustrate alphanumeric labels, and even if one were to assume that such labels in FIG.5 can be equated to Applicants hexadecimal encoding, it should be noted that labels in FIG. 5 are NOT assigned to nodes (other than said root node) by **concatenating encoded values of local identifiers of all nodes along a path from the root node to a node to which a node identifier is currently being assigned**. In FIG. 5 of Lentini, concatenating the identifiers within the oval shown below does not yield the identifier shown within the rectangle – i.e., concatenating A, A2, and A22 does NOT give us A222.



For clarification, the Examiner is respectfully requested to review figure 4 of the application-as-filed, where Applicants' concatenation feature is outlined.

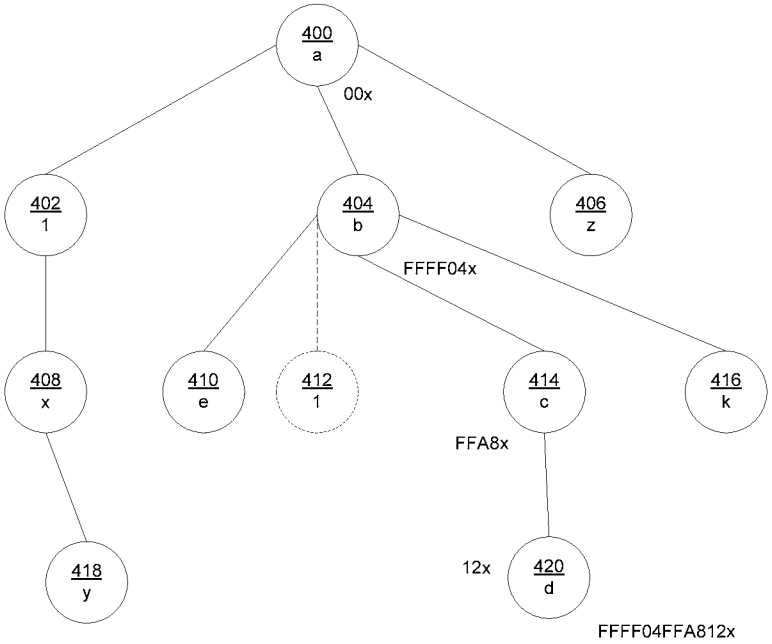


FIGURE 4

First, it should be seen from Applicants' FIG. 4 that there is a hexadecimal encoding associated with node a, b, c and d (i.e., 00x, FFFF04x, FFA8x, and 12x , respectively) and it should further be seen that what is concatenated as per Applicants' invention is the ***encodings*** for nodes *a*, *b*, *c* and *d*, whose values are 0, FFFF04x, and FFA8x, and 12x, respectively. Such a concatenation results in a node id for *d* with a value of FFFF04xFFA8x12x, which is a concatenation of the individual strings 0, FFFF04x, and FFA8x, and 12x.

In FIG. 5 of Lentini, there is NO teaching or suggestion for concatenating such hexadecimal encodings.

Applicants also respectfully submit that the secondary reference relied upon by the Examiner – i.e., Bowman – fails to remedy the shortcomings of the primary reference – i.e., Lentini.

Hence, at least for these reasons, Applicants respectfully assert that an improper 35 U.S.C. §103 rejection was issued with regards to independent claim 1 as the cited combination of Lentini and Bowman fail to teach or suggest many of the features of Applicants' pending independent claim 1. The arguments presented above substantially apply to independent claims 9 and 16 as the same rationale was used to reject at least the features described above. Hence, Applicants respectfully submit that an improper 35 U.S.C. §103 rejection was issued with regards to independent claims 9 and 16. The arguments presented above also substantially apply to dependent claims 2-4, 14-15, and 17-20, as they at least inherit all the features of the claim from which they depend (i.e., independent claim 1, 9, or 16). Hence, Applicants respectfully submit that an improper 35 U.S.C. §103 rejection was issued with regards to dependent claims 2-4, 14-15, and 17-20.

SUMMARY

As has been detailed above, none of the references provide for the specific claimed details of Applicants' presently claimed invention, nor renders them obvious. It is believed that this case is in condition for allowance and reconsideration thereof and early issuance is respectfully requested.

This response is being filed with a fee for an extension of time. The Commissioner is hereby authorized to charge the extension fee, as well as any deficiencies in the fees provided, to Deposit Account No. 50-4098.

If it is felt that an interview would expedite prosecution of this application, please do not hesitate to contact Applicants' representative at the below number.

Respectfully submitted,

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